

EXHIBIT 4

1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE EASTERN DISTRICT OF PENNSYLVANIA

3 JOHN C. MONARCH, an : CASE NO.
4 individual; DIRECT : 2:14-cv-05980-GAM
5 OUTBOUND SERVICES :
6 LLC, a South :
7 Carolina limited :
8 liability company, :
9 Plaintiffs :
10 :
11 :

12 vs. :
13 :
14 :

15 RICHARD A. GORMAN; :
16 GORMAN ECONOMICS, :
17 LLC, a Delaware :
18 limited liability :
19 company, dba AT :
20 COST FULFILLMENT; :
21 LLC, VANGUARD :
22 ECONOMICS, LLC, a :
23 Georgia limited :
24 liability company, :
 dba AT COST :
 FULFILLMENT, LLC, :
 dba :
 FULFILLMENT.COM; AT :
 COST :
 NUTRACEUTICALS, :
 LLC, a Georgia :
 limited liability :
 company; BRAND.COM, :
 INC., a :
 Pennsylvania :
 Corporation; JOHN :
 DOE 1; JOHN DOE 2; :
 and JOHN DOE 3, :
 Defendants :

25 - - -
26 Thursday, May 5, 2016
27 - - -

28 GOLKOW TECHNOLOGIES, INC.
29 877.370.3377 ph | 917.591.5672 fax
30 deps@golkow.com

1 Q. So you believe, I think you
2 testified earlier, correct me if I am
3 wrong, that you believe Mr. Monarch is
4 this person that goes by Ilya or Ilya
5 BLT; is that correct?

6 A. I believe that through the
7 discovery in the lawsuit that I filed as
8 did Mr. Monarch in his countersuit that
9 Mr. Monarch is deeply involved and
10 actively or was actively involved in
11 using that fake name or alias if you
12 will.

13 Q. So you think, I'll just call
14 him Ilya because I'm really not sure of
15 his name, so you believe Ilya and Mr.
16 Monarch is the same person?

17 A. Well, I do.

18 Q. And as you sit here today,
19 you currently believe that?

20 A. Mr. Warner, I think that all
21 of the evidence, the circumstantial
22 evidence points that Mr. Monarch who, you
23 know, who utilizes lots of different
24 aliases and, you know, pseudonyms and

1 screen names on the Internet, I believe
2 that this Ilya, you know, alias or
3 pseudonym if you will is certainly
4 someone that -- or an alter ego of Mr.
5 Monarch's and he was invited to a private
6 dinner by this Ilya who goes by Ilya
7 Putin, Ilya Syanov, Ilya BLT and but yet
8 doesn't really know who this person is
9 and goes to a private dinner with him and
10 has his company logo, has the most
11 prominent logo listed on this Ilya
12 website and it just so happens that I
13 think every person, just about every
14 person that this Ilya person had attacked
15 on PerformOutsider through our discovery
16 it looks like Mr. Monarch has also
17 attacked or contributed or opined when
18 that person was being attacked in a
19 sarcastic manner.

20 You know, it's odd that all
21 of these other banners we found in
22 discovery, you know, Greenville, South
23 Carolina, a placed that I mean is for the
24 Internet marketing world is really is

1 objection.

2 MR. WARNER: Please keep it
3 to form.

4 THE WITNESS: Well, Mr.
5 Monarch patently denies being
6 involved in this PerformOutsider
7 in any, way, shape or form other
8 than the fact that this, you know,
9 this I guess Ilya person is
10 someone different and that he
11 believes that he's proven this is
12 someone different than himself.

13 So I really do believe that anyone
14 that objectively looks at this
15 evidence here that we've found
16 through the discovery process, you
17 know, in this litigation would
18 find that Mr. Monarch is indeed
19 deeply involved.

20 Mr. Monarch is somebody that
21 goes to great lengths to hide his
22 identity online. For instance,
23 his advertising network Stealth
24 Media. Right? Stealth. He likes

1 Q. Are you familiar with this
2 document?

3 A. I vaguely recall it.

4 Q. This is the First Amended
5 Verified Complaint you filed against Ilya
6 Syanov -- am I saying that right? Do you
7 know how to pronounce that?

8 A. I don't.

9 Q. Okay. So Ilya Syanov and
10 Karl F. Steinborn.

11 A. John Doe 1, John Doe 2 and
12 John Doe 3.

13 Q. Right. Let's look at
14 Paragraph 16. Can you read that please
15 aloud?

16 A. On or about July 29, 2013,
17 an article appeared on the website
18 PerformOutsider.com which contained
19 numerous erroneous statements concerning
20 criminal activity and Plaintiff Gorman,
21 see PerformOutsider.com/2013/07/29/
22 richard-gorman-aka-directresponse-net-
23 criminal-past, period. A true and
24 accurate copy of the July 29th, 2013

1 know what Mr. Montgomery would testify
2 to, I don't know whether, you know, the
3 veracity or mendacity of Mr. Montgomery,
4 what he would say, however -- yeah, I
5 just don't know what his testimony would
6 be.

7 Q. I'm going to ask you a
8 hypothetical question. They're probably
9 going to object but I'm going to ask you
10 anyway. If I were to get all these
11 people together and parade them into the
12 courtroom and get them up there one after
13 the other and talk about how they had
14 dinner with this guy and his name is Ilya
15 and they went out with him for drinks,
16 showed I.D., blah, blah, blah, would you
17 still believe that Mr. Monarch and Ilya
18 is the same person?

19 MR. CROSS: Objection.

20 THE WITNESS: Absolutely.

21 BY MR. WARNER:

22 Q. You would?

23 A. Uh-huh.

24 Q. Wow! Okay.

1 A. It does.

2 Q. Okay. Did you help your --
3 did you verify the answers to these
4 Request for Admissions?

5 A. I believe so.

6 Q. Let's look at Request Number
7 2. It's on Page 2. It says that admit
8 that Ilya and Monarch is not the same
9 person. And can you read where it starts
10 "as indicated above"? Do you see where
11 that is? You can read the whole response
12 if you'd like.

13 A. Which one are you pointing
14 to?

15 Q. Sure. This is the response.

16 A. Okay. You want me to start
17 reading here?

18 Q. Yeah.

19 A. Sure. 2: Admit that Ilya
20 and Monarch is not the same person.

21 Response: Plaintiff is
22 without sufficient information or
23 personal knowledge to admit or deny this
24 request. Plaintiff has made a reasonable

1 inquiry, and information known or readily
2 obtainable by Plaintiff is insufficient
3 to enable him to admit or deny this
4 Request. As indicated above, Plaintiff
5 believes and is informed that Monarch and
6 Ilya are separate persons; this person
7 (sic) is based in part on Monarch's own
8 discovery responses and his action;
9 however, this belief is not based on
10 Plaintiff's personal knowledge.

11 Q. Is this correct?

12 MR. RILEY: Objection to the
13 form of the question. I'll allow
14 the witness to respond.

15 MR. CROSS: Join.

16 THE WITNESS: Plaintiff is
17 without sufficient information or
18 personal knowledge to admit or
19 deny this request; plaintiff has
20 made a reasonable inquiry and
21 information known or readily
22 obtained by Plaintiff is
23 insufficient to enable him to
24 admit or deny this request.

1 I believe that at the time,
2 as indicated above, Plaintiff
3 believes and is informed that
4 Monarch and Ilya are separate
5 persons, this belief -- this
6 belief is based in part on
7 Monarch's own discovery responses
8 in this action; however, this
9 belief is not based on Plaintiff's
10 personal knowledge.

11 That's correct.

12 BY MR. WARNER:

13 Q. That's correct?

14 A. Yes, as of that time.

15 Q. As of that time?

16 A. Yes.

17 Q. Okay. What have you learned
18 since then that would change your belief?

19 A. Sure. Well, you know, I've
20 spent significant time with counsel in
21 this case.

22 MR. CROSS: I just want to
23 make sure you're not revealing
24 things that counsel and you have